

Exhibit A

NOTICE OF COLLECTIVE ACTION LAWSUIT WITH OPPORTUNITY TO JOIN

Agonath, et al. v. Interstate Home Loans Center, Inc. et al., Case No: 2:17-cv-5267-JS-SIL
United States District Court, Eastern District of New York

TO ALL LOAN OFFICERS EMPLOYED BY INTERSTATE HOME LOANS CENTER, INC. AT ANY TIME BETWEEN APRIL 6, 2015 AND THE PRESENT, PLEASE READ THIS NOTICE CAREFULLY.

RE: Lawsuit Alleging Unpaid Overtime Wages for Work Performed in Excess of 40 Hours in Given Workweeks.

I. INTRODUCTION

A collective action lawsuit has been filed against Interstate Home Loans Center, Inc., Terence Cullen, Alex Niven, Kenneth Tumsuden, Jeanne Wickes, and Ellen Zuckerman (collectively referred to herein as “Interstate” or “Defendants”) for the alleged failure to pay overtime compensation for hours worked in excess of 40 in given workweeks to Loan Officers as required by law. Defendants deny any wrongdoing to Named Plaintiffs or to you based on their claim that, among other things, loan officers are exempt as outside salespeople. However, you are potentially “similarly situated” to the Named Plaintiffs in the lawsuit and, therefore, may be able to join this lawsuit. This letter advises you how this suit may affect your rights and instructs you on the procedure for participating in this suit, if you choose to join. You are not being sued.

II. DESCRIPTION OF THE LAWSUIT

On September 7, 2017, Jeffery Agonath, James Allen, Brian Daley, Kevin Rogers, and Michael Galarza (collectively referred to herein as “Named Plaintiffs”) sued Interstate, on behalf of themselves and all other employees who were designated, paid, or employed by Defendants as Loan Officers, for allegedly failing to pay overtime compensation for hours worked in excess of 40 in given workweeks under the Fair Labor Standards Act. The lawsuit was filed in the United States District Court, Eastern District of New York.

Among other allegations, Named Plaintiffs allege that Interstate required Loan Officers to work hours in excess of forty (40) each workweek without paying them overtime compensation for hours worked in excess of 40 in given workweeks as required by law. Named Plaintiffs are seeking to recover compensation for all the overtime hours that they worked in excess of 40 in given workweeks, plus interest, liquidated damages, reasonable attorneys’ fees and litigation costs for themselves and for you, if you decide to join this lawsuit.

Interstate denies any wrongdoing to Named Plaintiffs or to any past or present employees, and contends that Loan Officers are exempt due to, among other things, their classification as outside salespeople. No determination has been made as to whether or not you are owed any overtime wages for hours worked in excess of 40 in given workweeks, and the Court is not endorsing the merits of the lawsuit or advising you to participate in the lawsuit. There is no money available now, and no guarantee there will be.

III. WHO CAN JOIN

If you were employed by Interstate as a Loan Officer at any time from April 6, 2015 to the present, you are eligible to join this lawsuit.

If you do not meet those criteria, or if you have already brought a lawsuit against Interstate for failure to pay overtime wages owed to you, you may not be eligible to join this lawsuit.

IV. YOUR RIGHT TO PARTICIPATE IN THIS SUIT

If you fit the definition above and agree to the representation of Named Plaintiffs' counsel, you may join this suit (that is, you may "opt-in") by completing the enclosed Opt-in Consent Form and returning your Opt-in Consent Form to Named Plaintiffs' counsel by U.S. mail, facsimile transmission, or e-mail correspondence at the following mailing address, fax number, or e-mail address:

NEIL H. GREENBERG & ASSOCIATES, P.C.

Attn: *Agonath, et al. v. Interstate Home Loans Center, Inc., et al.*

Collective Action

4242 Merrick Road

Massapequa, New York 11758

Phone: (516) 228-5100

Fax: (516) 228-5106

nhglaw@nhglaw.com

This Opt-in Consent Form must be completed and returned in sufficient time to have Named Plaintiffs' counsel file it with the Clerk of the Federal Court **on or before [Insert Date-60 Days from the Date of Mailing]**.

If you do not return the Opt-In Consent Form to Named Plaintiffs' counsel in time for it to be filed with the Federal Court **by close of business on [Insert Date-60 Days from the Date of Mailing]**, you may not be able to participate in the lawsuit.

V. EFFECT OF JOINING THIS SUIT

If you choose to join this lawsuit, you will be bound by any ruling, settlement, or judgment, whether it is favorable or unfavorable. The attorneys for Named Plaintiffs and prospective collective action members are being paid on a contingency fee basis, which means that if there is no recovery, there will be no attorneys' fee. If there is a recovery, the attorneys for the prospective collective action members will receive a part of any settlement obtained or money judgment entered in favor of all members of the collective action lawsuit.

By joining this lawsuit, you designate Named Plaintiffs and their counsel as your representatives, and permit Named Plaintiffs to make decisions on your behalf concerning the litigation, the method and manner of conducting this litigation, the entering of an agreement with Named Plaintiffs' counsel concerning attorneys' fees and costs, settlement, and all other matters pertaining to this lawsuit. If you join this lawsuit, you may be asked to give written or oral testimony and information about your work for Interstate to help the Court decide whether you are owed any money. Accordingly, should you choose to join this lawsuit, please preserve all records

relating to your employment with Interstate. The decisions and agreements made and entered into by Named Plaintiffs will be binding on you if you join this lawsuit.

VI. NO LEGAL EFFECT IN NOT JOINING THIS SUIT

If you choose not to join this lawsuit, you will not be affected by any judgment or settlement rendered in this case. If you choose not to join this lawsuit, you are free to file your own lawsuit. The statute of limitations will continue to run on your claim until you join this suit or file your own.

VII. NO RETALIATION PERMITTED

If you join this lawsuit and exercise your rights under the Fair Labor Standards Act, federal law prohibits Defendants from discharging or in any other manner discriminating or retaliating against you. In the event you join this lawsuit and you believe that any such discrimination or retaliation has occurred, you should notify Named Plaintiffs' counsel.

VIII. YOUR LEGAL REPRESENTATION IF YOU JOIN

You are free to be represented by counsel of your own choosing (at your own expense) or by Named Plaintiffs' counsel, as counsel for the collective action members. Counsel for Named Plaintiffs and collective action members are:

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**NEIL H. GREENBERG &
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4242 Merrick Road
Massapequa, NY 11758
Phone: (516) 228-5100
Fax: (516) 228-5106
E-Mail:
nhglaw@nhglaw.com

If you choose to hire your own attorney to represent you in this matter, he or she must file an Opt-in Consent Form with the Clerk of the Federal Court **on or before [INSERT DATE-60 days from the Date of Mailing]**.

IX. FURTHER INFORMATION

You may obtain further information about this Notice, filing an Opt-in Consent Form, or answers to questions concerning this lawsuit by calling or writing any of Named Plaintiffs' counsel at the telephone numbers, mailing addresses and e-mail addresses listed above. Please do not contact the Court with questions regarding this Notice.

****PLEASE NOTE****

Under the federal Fair Labor Standards Act, there is a two (2) year deadline for filing overtime claims, or three (3) years if the violation was willful, running from the date(s) the overtime hours were actually worked. Thus, you should return your Opt-in Consent Form as soon as possible so we may file it with the Court and preserve your federal claim.

Complete and Return To:

NEIL H. GREENBERG & ASSOCIATES, P.C.

Attn: Agonath, et al. v. Interstate Home Loans Center, Inc., et al.

4242 Merrick Road

Massapequa, New York 11758

Phone: (516) 228-5100

Fax: (516) 228-5106

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THIS NOTICE AND ITS CONTENTS HAVE BEEN AUTHORIZED BY THE UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF NEW YORK, HONORABLE STEVEN I. LOCKE, UNITED STATES MAGISTRATE JUDGE. THE COURT HAS TAKEN NO POSITION IN THIS CASE REGARDING THE MERITS OF NAMED PLAINTIFFS' CLAIMS OR OF DEFENDANTS' DEFENSES.